

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Citizens Telecommunications Company)	
of Illinois and Grafton Technologies, Inc.)	
)	Docket No. 02-
Joint Petition for Approval of Second)	
Negotiated Amendment to Interconnection)	
Agreement pursuant to 47 U.S.C. § 252.)	

**STATEMENT IN SUPPORT OF JOINT PETITION
FOR APPROVAL OF NEGOTIATED AMENDMENT**

1. I, David Ruhland am a regulatory manager for Citizens Telecommunications Company of Illinois ("Citizens"), and submit this Statement in Support of the Joint Petition for Approval of a Second Amendment to Agreement between Citizens and Grafton Technologies, Inc. ("Grafton").
2. The attached Second Amendment to Agreement (the "Second Amendment") between Citizens and Grafton was reached through voluntary negotiations between the parties.
3. In accordance with § 251 and 252 of the Act, the parties engaged in good faith negotiations. The Second Amendment establishes the financial and operational terms between Citizens and Grafton.
4. The key provisions of the Agreement relate to Local Number Portability Services.
5. The Second Amendment is not discriminatory. Citizens will make this Second Amendment available to any other telecommunication's carrier who requests it and is operating within Citizens service territory. Other telecommunications' carriers can negotiate their own arrangements pursuant to the applicable provisions of the Act.

6. The Second Amendment is the product of good faith, arms-length negotiations between competitors. Overall, the Second Amendment is acceptable to both parties and it shows that two competitors, negotiating in good faith under the terms of the Act, can arrive at a mutually beneficial business arrangement that overall meets their individual business interests and furthers the cause of competition in the local exchange market. This is precisely the process Congress envisioned in crafting the Act. See S. Rep. No. 23, 104th Cong., 1st Sess. at p. 19. ("The Committee intends to encourage private negotiation of interconnection agreement.") (The Conference Committee on the Telecommunications Act of 1996 receded to the Senate on § 252(a) and (b), see Joint Explanatory Statement of the Committee of Conference at p. 125.)


7. The Second Amendment is consistent with the public interest, convenience and necessity, meets all the requirements of the Act and the Commission should approve it.

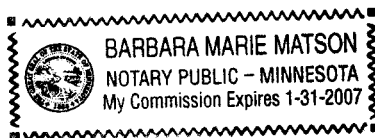


David Ruhland

Subscribed and sworn to before me

this 7th day of January, 2003.


Notary Public



**AMENDMENT ONE TO THE
AGREEMENT FOR WIRELINE
NETWORK INTERCONNECTION**

This Amendment Two to the Agreement for Local Interconnection (the "Agreement") between Citizens Telecommunications Company of Illinois, Inc. ("Citizens") and Grafton Technologies, Inc. ("Carrier"), is made this 5th day of September, 2002. Citizens and Carrier are referred to herein collectively as the "Parties".

Citizens and Carrier entered into the Agreement in June, 2001.

Citizens and Carrier desire to amend the Agreement that was approved by the Illinois Commerce Commission's Order dated January 24, 2002 Docket No. 01-0771.

In consideration of the mutual promises and covenants contained herein, and for other good and valuable consideration, the Parties agree as follows:

- 1) Amend existing Agreement to include language for Local Number Portability (LNP). Please include within existing agreement Attachment 7 – LNP Title Sheet and pages 1, 2 and Exhibit A & B pages 1, 2, & 3.

All other terms and conditions of the Agreement will remain in full force and effect.

For Carrier:
Grafton Technologies, Inc.

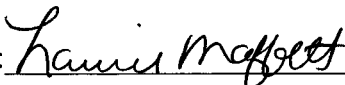
By: 

Typed: Mike Arnold

Title: V.P./ General Manager

Date: 9/16/02

For Citizens:
Citizens Telecommunications
Company of Illinois, Inc.

By: 

Typed: Laurie Maffett

Title: V.P. Reg. & Carrier Services

Date: 10/17/02

ATTACHMENT 7

LOCAL NUMBER PORTABILITY

ATTACHMENT 7 – Local Number Portability

SECTION 1. Local Number Portability (LNP)

1.1 General

Citizens will convert to LNP once a Bona Fide Request is received from the Carrier. When the Bona Fide Request is received Citizens Telecommunications Company of Illinois will have 180 days to provide portability in the requested central office to provide the necessary hardware and software. The technology that meets the FCC's performance criteria is Location Routing Number (LRN). LRN is currently being used by the telecommunications industry to provide LNP.

1.2 Terms and Conditions

Citizens will only provide LNP services and facilities where technically feasible, subject to the availability of facilities, and only from properly equipped central offices. LNP applies only when a customer with an active account wishes to change local carriers while retaining the telephone number or numbers associated with the account.

An LNP telephone number may be assigned by Carrier only to Carrier's customers located within Citizens' rate center, which is associated with the NXX of the ported number.

If Carrier requests service for an End User that has been denied service or disconnected for non-payment by Citizens, and the End User still has an outstanding balance with Citizens, Citizens will not port the number for that End User to the Carrier until the outstanding balance is paid. Denied service means that the service of an End User provided by a local exchange telecommunications company, including Citizens, has been temporarily suspended for non-payment and is subject to complete disconnection. Rules on disconnection of End User service can be found in the appropriate Citizens local state tariff.

1.3 Obligations of Citizens

Citizen will deploy LNP in the specified central offices 180 days after receiving a Bona Fide Request for LNP from a Carrier. (See Exhibit A and B).

Citizens will participate in LNP testing in accordance with North American Numbering Council (NANC) standards.

Citizens will follow recommended National Emergency Number Association (NENA) standards for LNP until or as such time the standards are superseded by federal, state, or local legislation.

1.4 Obligations of CARRIER

Carrier is required to send to Citizens a completed Bona Fide Request Form for LNP deployment.

Carrier is responsible to coordinate with the local E911 and Public Services Answering Point (PSAP) coordinators to insure a seamless transfer of end user emergency services.

Carrier is required to meet all mutually agreed upon testing dates and implementation schedules. Both Parties will perform testing as specified in industry guidelines and cooperate in conducting any additional testing to ensure interoperability between networks and systems. Each party

shall inform the other Party of any system updates that may affect the other Party's network and each Party shall, at the other Party's request perform tests to validate the operation of the network.

Carrier is responsible to meet all Number Portability Administration Center (NPAC) and North American Numbering Council (NANC) requirements and in providing its own access to regional NPAC.

Carrier is responsible for providing its own access to the Service Order Administration (SOA).

Carrier is responsible to meet all the Industry requirements for LNP, including but not limited to allowing porting of Carrier's numbers.

EXHIBIT A

**LOCAL NUMBER PORTABILITY (LNP)
BONA FIDE REQUEST (BFR)**

DATE: _____ (date of request)

TO: _____ (name of service provider)
_____ (address of service provider)
_____ (contact name /number)

FROM: _____ (requester/service provider name/ID)
_____ (requester/operating company number (OCN))
_____ (requester switch(es)/CLLI)
_____ (authorized by name)
_____ (authorized by title)
_____ (contact name/address/number)

Affidavit attesting requester as authorized agent should accompany request.

SWITCH(ES):

CLLI ¹	Rate Center Name ²	Rate Center VC/HC ²	NPA-NXX(s) ³
_____	_____	_____	All: Y or N
_____	_____	_____	All: Y or N
_____	_____	_____	All: Y or N
_____	_____	_____	All: Y or N
_____	_____	_____	All: Y or N

Please provide Requestor's information below:

CARRIER/REQUESTOR:

CLLI ¹	Rate Center Name ²	Rate Center VC/HC ²	NPA-NXX(s) ³
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

DATES: Requested date switch(es) should be LNP capable: _____ (mm/dd/yy)
Requested code opening date: _____ (mm/dd/yy)

Notes: See following page.

Acknowledgment of BFR is to be sent to the requester within ten business days.

EXHIBIT A

LOCAL NUMBER PORTABILITY (LNP) BONA FIDE REQUEST (BFR) (Continued)

Notes: 1 List each switch targeted for LNP by its specific CLLI code.

² Enter associated Rate Center information from LERG, including: Rate Center Name and Associated V&H Terminating Point Master Coordinates;
Source of the LERG information: Destination Code Record (DRD) Screen.

³ Circle or highlight Y if requesting all eligible NPA-NXX codes in that specific switch to be opened. Circle or highlight N if only certain NPA NXX codes are being requested. Then provide list of desired NPA NXX(s).

Note: Targeting of specific NPA-NXX codes should be carefully considered. A traditional ILEC may serve a single rate center with multiple switches (CLLIs and NXX codes) while CARRIER may serve multiple rate centers with a single switch. In the latter case, use of a specific NXX code will determine the rate center.

EXHIBIT B

Acknowledgment of LNP Bona Fide Request (BFR)

DATE: _____ **(date of response)**

TO: _____ **(requester/CARRIER name/ID)**
_____ **(contact name/address/number)**
_____ **(requester switch(es)/CLLI)**

FROM: _____ **(name of service provider)**
_____ **(address of provider)**
_____ **(contact name/number)**

Switch request(s) accepted:

CLLI Accepted	LNP Effective Date	or	Modified Effective Date	Ineligible NPA-NXXs
_____ (CLLI 1)	_____		_____	_____
_____ (CLLI 2)	_____		_____	_____
_____ (CLLI 3)	_____		_____	_____
_____ (CLLI 4)	_____		_____	_____

Switch request(s) denied/reason for denial:

_____ (CLLI 1) _____

_____ (CLLI 2) _____

_____ (CLLI 3) _____

Authorized company representative signature/title: _____